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8 Attorneys for Defendants
SHARP CORPORATION and
9 SHARP ELECTRONICS CORPORATION

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13
14 IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

Master File No. 3:07-md-1827 SI
MDL No. 1827

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16 This Document Relates To:
17 ALL DIRECT AND INDIRECT
PURCHASER CLASS ACTIONS

**STIPULATION AND [PROPOSED]
ORDER REGARDING SHARP
DEPOSITIONS AND FACT
DISCOVERY CUT-OFF**

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19
20 Direct Purchaser Class Plaintiffs ("DPPs") and Indirect Purchaser Class Plaintiffs
21 ("IPPs") (collectively, "Plaintiffs") and Defendants Sharp Corporation and Sharp
22 Electronics Corporation (collectively, "Sharp") hereby stipulate as follows:

23 WHEREAS on April 15, 2011, Plaintiffs made a request to Sharp to take Mr. Youji
24 Maekawa's deposition;

25 WHEREAS Mr. Maekawa recently suffered serious health issues;

26 WHEREAS on April 29, 2011, Plaintiffs noticed numerous additional depositions of
27 Sharp personnel;

1 WHEREAS on April 11 and April 29, 2011, Plaintiffs served Rule 30(b)(6)
2 deposition notices of Sharp;

3 WHEREAS the discovery cut-off in the class actions was May 11, 2011;

4 WHEREAS Plaintiffs and Sharp have met and conferred regarding scheduling
5 certain Sharp depositions and Plaintiffs' withdrawal of certain deposition notices;

6 NOW, THEREFORE, Plaintiffs and Sharp, through their undersigned respective
7 counsel, stipulate and request that the Court order as follows:

8 1. The fact discovery cutoff date of May 11, 2011 set forth in the Order re:
9 Pretrial and Trial Schedule (Dkt. 2165) is extended, solely as to the depositions of Mr.
10 Maekawa and Mr. Yasuhisa Iida, up to and including July 31, 2011.

11 2. The deposition of Mr. Iida shall take place on June 29-30, 2011, at the
12 offices of Pillsbury Winthrop Shaw Pittman LLP in San Francisco.

13 3. The deposition of Mr. Maekawa shall take place on dates to be agreed upon,
14 at a location in Japan or in Taipei, Taiwan.

15 4. On April 29, 2011, Plaintiffs noticed the deposition of six Sharp employees
16 – Hiroshi Watari, Toshihiro Yamashita, Yukihiro Ueno, Shuichi Saito, Shuji Sako and
17 Masakazu Wada – on the grounds that these individuals were identified in April 2011
18 discovery responses as potential trial witnesses. Based on the information and evidence
19 currently known to Sharp, Sharp does not anticipate calling these individuals as witnesses at
20 trial. On that basis plaintiffs withdraw their deposition notices. If Sharp determines it
21 wishes to call these witnesses to rebut new evidence or information not presently known to
22 Sharp, Sharp will notify plaintiffs in a timely fashion and produce the witnesses it wishes to
23 call for deposition in San Francisco.

24 5. Sharp and Plaintiffs have on-going disputes over Rule 30(b)(6) deposition
25 notices served by Plaintiffs, including notices served on April 11 and April 29, 2011.
26 Discussions regarding those issues are continuing and the parties hope that they will be able
27 to reach agreement. If not, any remaining disputes will be presented to the Special Master.
28

1 6. Sharp and the IPPs have on-going disputes as to the IPPs' notices of the
2 depositions of Messrs. Machida, Takahashi, Nakabu, Tani and Matsumura. These issues
3 will be presented to the Special Master as needed.

4 7. All other issues regarding Plaintiffs' notices of depositions of Sharp
5 personnel or other requests for Sharp depositions are resolved. Plaintiffs agree that they
6 will not pursue any Sharp depositions other than those addressed in this stipulation.

7 8. The Direct Action Plaintiffs have requested additional depositions of Sharp
8 personnel, which are not addressed by this stipulation. Sharp reserves all rights to oppose
9 such depositions on any available grounds, including that the limit on depositions of Sharp
10 witnesses set by the Court has been exhausted.

11 Dated: May 20, 2011.

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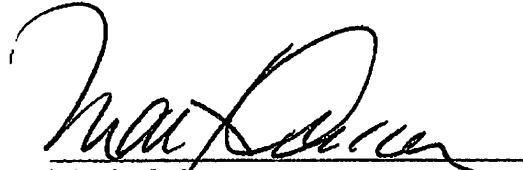
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11 **IT IS SO RECOMMENDED.**

12 Dated Entered: 5/24/11

13 
14 Martin Quinn
15 Special Master

16 **IT IS SO ORDERED.**

17 Dated Entered: 5/25/11

18 
19 The Honorable Susan Y. Illston
20 District Court Judge

21 **ATTESTATION:** Pursuant to General Order 45, Part X-B, the filer attests that
22 concurrence in the filing of this document has been obtained from Brendan Glackin; Bruce
23 L. Simon; Judith A. Zahid; and Joseph M. Alioto.
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